

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

OCT 10 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)

CC Docket 92-105

Request of the Department of Justice)
that 311 Be Reserved for Community Use)
for Non-Emergency Police Telephone Calls)

DOCKET FILE COPY ORIGINAL

**COMMENTS OF
NENA AND NASNA**

The National Emergency Number Association ("NENA") and the National Association of State Nine One One Administrators ("NASNA"), hereafter "9-1-1 Commenters," respond to the Commission's invitation to comment on the captioned request of the U.S. Department of Justice ("DOJ").¹ According to DOJ, its request follows the urging of President Clinton that the Attorney General "work with the Federal Communications Commission, law enforcement leaders, and the telecommunications industry to develop a national community policing number for nonemergency calls that 'will be as easy to use and remember as 9-1-1'."²

¹ Public Notice, DA 96-1500, September 10, 1996. Comment was requested by October 10th. Asked why a single round of comments was provided for, without the usual opportunity for reply to initial views, a spokesperson for the Network Services Division of the Common Carrier Bureau said the FCC was anxious to complete work on several related aspects of CC Docket 92-105.

² Letter of Joseph E. Brann, Director of DOJ's Office of Community Oriented Policing Services, to Regina Keeney, Chief, Common Carrier Bureau, August 26, 1996.

No. of Copies rec'd
11/1/96

Interest of NENA and NASNA

NENA is a not-for-profit corporation founded in 1982 whose singular mission is to foster the technological advancement, availability and implementation of a universal emergency telephone number system. Its 5000 members in all 50 states and several U.S. territories include public safety communications call-takers and administrators; police, fire, medical and rescue responders; wireline and wireless service providers; and emergency communications equipment and service vendors. NASNA is an organization of state officials whose purposes include information-sharing among 9-1-1 agencies and programs.

The 9-1-1 Commenters know from experience that it is not easy or cheap to make an abbreviated dialing/selective routing system "easy to use," and that competing N-1-1 numbers assigned by states and communities already are diluting users' ability to "remember" the correct three digits to dial in genuine emergencies.

Background

When the Commission opened the captioned proceeding nearly four and a half years ago,³ it affirmed its "plenary jurisdiction over numbering plan issues" and tentatively concluded that the codes 211, 311, 511 and 711 should be available for abbreviated dialing. The FCC was acting against the backdrop of a response to BellSouth that "there appears to be no legal or regulatory impediment prohibiting BellSouth from currently assigning N11 codes in a reasonable, non-discriminatory manner" for use in delivery of enhanced/information services via telephone. *Id.* at 3004, ¶8 and n.1. While thus effectively leaving abbreviated number assignment in carrier and state

³ Notice of Proposed Rulemaking, 7 FCC Rcd 3004 (1992).

regulatory hands pending the completion of the rulemaking, the Notice nevertheless cautioned:

- "Dialing schemes of differing lengths may increase the cost and complexity of designing, manufacturing, and programming telephone switches." (§9)
- "We do not propose to disturb the use of 9-1-1 for emergency services or the use of 411 for directory information services" (§11) even in areas where those digits were not yet employed for such purposes, thus effectively expressing a national reservation.
- Because the available N11 codes might later be needed for use as area codes for interexchange calls, the codes should only be available for abbreviated dialing "unless and until it becomes necessary to use [them] as area codes," (§13) with recall on a notice as short as six months.
- While 9-1-1 and 411 appear to enjoy "widespread customer familiarity" and cause between them relatively little confusion, "we note that dialing schemes of differing lengths -- as found in different parts of Europe -- can lead to customer confusion." (§18)
- Three or four-digit abbreviated dialing may be useful in formats other than N11, such as *XX or XX#. (§19)

In 1993 and 1994, respectively, the Commission received and put out for public comment (1) a joint petition from the National Center for Law and Deafness ("NCLD") and Telecommunications for the Deaf ("TD") for use of 711 and a second unspecified code, "to facilitate access by individuals with hearing and speech disabilities and other text telephone users to telecommunications relay services (TRS);" and (2) a petition from the federal

General Services Administration ("GSA") to assign an N11 code for public access to federal executive agencies.⁴

In Reply Comments dated September 23, 1994, NENA noted the concerns expressed, on the IAD 94-101 record, by three separate Louisiana parish (county) communications agencies regarding that state's assignment of a 311 code to an ambulance service: "These concerns over public confusion and delay in completion of 9-1-1 calls need to be addressed by the Commission on a nationwide basis." (Reply Comments, 3) Problems would be magnified, NENA suggested, if required payment for certain services reached by abbreviated dialing led callers to hesitate to use 9-1-1. In conclusion, we urged a "comprehensive rulemaking" to "develop national standards and oversee assignments based upon those standards." (*Id.* at 4)

NENA's Response to the President and DOJ

Shortly after reading press accounts of President Clinton's remarks and the related White House Statement of the same date, July 23, 1996, NENA spoke with officials of DOJ's Community Oriented Policing office, including its Director. We provided to the Attorney General and to Chairman Hundt of the FCC formal copies of a letter to the President⁵ (Attachment A) which stated, in part:

- 9-1-1 networks in most of the country are not overloaded.
- 9-1-1 call-takers are trained to refer non-emergencies to other numbers, usually 7-digit and well-advertised for that less urgent purpose.

⁴ Public Notice, DA 94-644, June 17, 1994; IAD File Nos. 93-02 and 94-101.

⁵ From NENA President John Ellison, Executive Director, Shelby County, Alabama 9-1-1, dated August 2, 1996.

- Where 9-1-1 system overloads do occur, they typically result from too few call-takers, inadequate call-taker training, a need for better consumer education, and mass calling by cellular telephone users to report highway or other accidents or incidents which may or may not represent emergencies.

- Bifurcating calls into emergency and non-emergency classifications will not, of itself, change the number of calls that still must be answered, and may deter 9-1-1 calling by persons unsure if their needs are sufficiently urgent.

- Abbreviated dialing is most needed in emergencies, where time is of the essence, and scarce number resources ought not be used for non-emergencies, where 7-digit numbers are in plentiful use and future supply.

- The competing use of 3-digit numbers is "bound to dilute the public ability to remember and use 9-1-1."

- Abbreviated dialing systems are hugely expensive, and are not cost-effective if 7-digit or 800-prefix numbers would suffice for local or national purposes.

NENA closed its letter to President Clinton by thanking him for the objective of "keeping 9-1-1 lines clear for true emergencies" and offering to work with DOJ and others "to consider alternative means of handling police non-emergency calls." Courtesy copies of the letter were provided to Joseph Brann and other interested individuals.

A similar letter was sent to the President by the Associated Public-Safety Communications Officials International, Inc. ("APCO"),⁶ with copies to the Attorney General, FCC Chairman, DOJ's Office of Community Oriented

⁶ From APCO President Marilyn Ward of the Orlando Police Department, dated August 21, 1996.

Policing and other interested associations, including NENA. Among other points, the APCO communication suggested a national task force to look into the multiple ramifications of technology, public education, funding and local responsibility implicated by the President's proposal.

To NENA's knowledge, DOJ's Office of Community Oriented Policing did little more than listen politely (and quite briefly) to representatives of NENA and APCO, who constitute -- so far as we can tell -- a missing link in the process of developing the concept of a national community policing number for non-emergencies. To the best of our information, sheriffs' associations and some police departments have been consulted, but not public safety communicators. This is a peculiar omission, given that the concept seems to be driven by the erroneous impression that 9-1-1 system overloading is a crisis of national proportions. As both NENA and APCO have advised the President and DOJ, this simply is not the case.

But our purpose here is not to complain of past exclusion. Instead, the 9-1-1 Commenters intend to make sure that this proceeding is as deliberate and comprehensive as it must be -- so as to constitute the national forum which distinctly was not provided to public safety communicators in advance of DOJ's request to the FCC.

**Nothing in the President's request
limits the solution to N11 numbers.**

Both the NENA and APCO communications to President Clinton question the need for an abbreviated-dialing N11 number to request non-emergency assistance. The reasons include: (1) Time, and speed-dialing, are not of the essence; (2) N11 numbers are particularly scarce; (3) 7-digit and 10-digit (*e.g.* 800-prefix) are not in such short supply; (4) N11 systems are expensive, especially if coupled with selective routing, as the Commission

acknowledged in the 1992 Notice; (5) the N11 numbers already in service show wide local variations; (6) in some cases, the competing uses are creating confusion for 9-1-1 callers.

The DOJ request assumes, without explanation, that a national non-emergency community policing number should be in the form N11. It bases the choice of "311" on "discussions with industry representatives." No mention is made of 800-prefix solutions such as the 1-800-379-COPS that was cited in both the NENA and APCO letters, nor is disparate existing local usage of 311 and other abbreviated-dialing codes taken into account.

Under the circumstances, it is not clear to us that a national 311 code will be easy to implement, nor would it necessarily be easier to remember than 7-digit or 800-prefix numbers that might be fashioned for the purpose. Even if an N11 number were memorable, its utility might be at the price of weakening 9-1-1 in the public mind. The 9-1-1 Commenters elaborate on each of these points below.

Disparate N11 codes already are in place,
presumably based on local needs and choice.

Attachment B is a partial compilation⁷ by NENA's national office of current use of N11 for both emergency and non-emergency purposes. Attachment C is a table of cellular telephone police and highway patrol access numbers for emergency and non-emergency purposes.⁸ The first compilation shows 311 usage in three states and testing in a fourth. The second table identifies 311 as a cellular access number in the St. Louis area.

⁷ NENA hopes that the compilation will be filled out by other comments in this proceeding.

⁸ Taken from "Summary of Cellular 9-1-1 Telephone Indicia Survey," California Highway Patrol, 1995, 5.

In themselves, these pre-existing uses are not an insurmountable barrier to employment of 311 for non-emergency community policing calls. But they raise a prior question: Whether national uniformity is really superior to local choice? They also suggest that, if common numbers are thought to be valuable across communities, there is a need for comprehensive consideration by the FCC of the earlier requests by NCLD/TD, GSA and additional pending requests beyond those of DOJ. As Attachments B and C indicate, the "711" sought for the hearing and speech-impaired is claimed for other purposes in Georgia, Nevada and New Jersey, while there appears to be no blank slate for any of the N11 options that would satisfy the GSA request.

Emerging evidence supports the
intuitive concern that too many
N11 competitors will create confusion.

In the 1992 Notice, the Commission adverted to the potential for user confusion in dialing codes of differing lengths, but then observed that both 411 and 9-1-1 seemed, at that point, to be familiar enough to be employed correctly most of the time. In Reply Comments in IAD 94-101, NENA expressed its greatest concern for similar-looking numbers used for near-identical purposes. The case in point was the 311 code then newly assigned to ambulance service dialing in some Louisiana communities.

Attachment D contains (1) a page from the Livingston (La.) Parish telephone directory; (2) a summary of a Louisiana Public Service Commission hearing called to monitor the results of one year's experience with the 311 assignment *vis a vis* 9-1-1; and (3) a letter from the Caddo Parish 9-1-1 administrator to the LPSC Commissioner who conducted the hearing. As summarized in the letter, "over 100 calls that were received by an N-1-1 number

(3-1-1) . . . should have been directed to a 9-1-1 center. In a public safety operation, this is unacceptable."

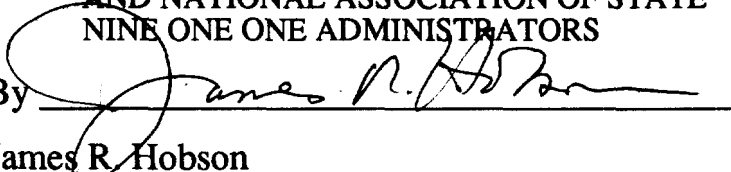
CONCLUSION

For the reasons discussed above, the Commission should seriously consider (1) the wisdom, in the first instance, of national N11 code assignments for any non-emergency purpose when 7-digit or other local and national alternative numbers exist; and (2) the need for standards in N11 assignment -- no matter at what level of government these are carried out -- to avoid the manifestly greater risk of confusion when purposes are similar to those of 9-1-1, such as police calls (even if non-emergency), summons to ambulance service, or any call to a public service agency (again, even if non-emergency). Ease of use and remembrance for non-emergency calls should not come at the expense of diminished performance for the well-established single national emergency number, 9-1-1.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION
AND NATIONAL ASSOCIATION OF STATE
NINE ONE ONE ADMINISTRATORS

By


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October 10, 1996

THEIR ATTORNEY

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August 2, 1996

William J. Clinton
The President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear President Clinton:

As President of the National Emergency Number Association (NENA), I am writing to thank you for the determination you expressed last week to maintain 9-1-1 as the principal means to telephone for emergency police, fire or medical assistance. We stand ready to work with the Department of Justice, the FCC, the telecommunications industry and law enforcement professionals in "keeping 911 lines clear for true emergencies." (White House Statement, July 23, 1996)

Based on NENA's 15 years of experience in emergency communications, and the nearly three decades of history of 9-1-1 calling, we respectfully suggest that there is no pat technical solution and no single national answer to the problem of distinguishing and separately routing and responding to emergency and non-emergency calls. Separating non-emergency calls will not change the overall level of calls that still must be answered by someone. Fundamentally, the cost-effective use of the 9-1-1 network depends on widespread public education and intensive training of emergency call-takers.

The single emergency number concept was inspired nationally but implemented locally, according to the varying needs and resources of state, county and municipal public safety administrations. Similarly, any plan for addressing perceived 9-1-1 problems caused by non-emergency use should take into account these local variations. For example, it is simply not accurate to declare generally, in the words of the July 23rd statement, that "all across the country, usage of 911 systems has grown dramatically, far outstripping the capacity of 911 operators to answer the calls."

To the contrary, 9-1-1 networks in most of the United States are not overloaded. While many of the calls taken by emergency operators are classifiable as non-emergencies, these operators typically are well trained to end such calls quickly and courteously by referring the call to other sources of assistance. Indeed, it is the very existence of well-identified, conventional 7-digit non-emergency numbers that allows misplaced non-emergency calls to 9-1-1 to be re-routed speedily and effectively.

The 9-1-1 "horror stories" that garner media attention from time to time tend to emanate from congested urban areas where network capacity, consumer education, and call-taker training may seriously need improvement. Accounts of system overloads also arise episodically from mass use of cellular phones by "good Samaritans" to report traffic accidents.

In the first of these cases, urban congestion, the solutions for large metropolises such as Los Angeles and Atlanta may not be optimal for Norfolk, Virginia or Arapahoe County, Colorado. Each of these areas was cited in the July 23rd statement for their large percentages of non-emergency calls made to 9-1-1 numbers. In our experience, public safety offices with consistent call overloading usually need more call-takers. The operative question, we believe, is how well the calls are handled. If Arapaho County 9-1-1 call-takers are able to receive so many non-emergency calls and still respond effectively to emergencies, the situation there is not one of national crisis.

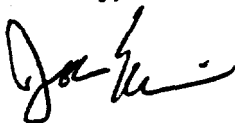
In the second case, episodic mass calling from cellular phones, the FCC issued July 26th a set of "wireless compatibility" regulations for 9-1-1 calling which, over the next 18 months to five years, will go a long way toward relieving this problem — through automatic identification of the mobile caller's telephone number and location — and are likely to inspire additional non-regulatory solutions. While the cellular mass calling phenomenon remains a present aggravation for callers and responders, it is not unlike the multiple consumer reporting of power outages which utility companies are learning how to deal with.

Finally, Mr. President, you were quoted as urging a national police non-emergency number "as easy to use and remember as 911." Nothing in your remarks suggests that such a national number be three-digit "abbreviated dialing." NENA generally has opposed the assignment of abbreviated-dialing numbers for non-emergency purposes, for at least three reasons: (1) If the call is not an emergency, conventional dialing will suffice; (2) the competing use of three-digit numbers is bound to dilute the public ability to remember and use 9-1-1; and (3) abbreviated dialing systems are quite expensive, as testified to by the billions of dollars already invested in the "wireline" 9-1-1 network and the large sums that will be required to achieve "wireless compatibility." In short, abbreviated dialing is not cost-effective if local 7-digit numbers or 800 numbers will do the job.

Local police 7-digit non-emergency numbers already are in use. Others can be readily obtained where needed, including easy-to-remember combinations of digits. If local police departments wish to pay for an 800-number service such as the "379-COPS" access announced by AT&T, they should be free to do so. But we strongly doubt that a national abbreviated-dialing system of non-emergency access to community policing services is desirable or necessary.

As a not-for-profit organization of 5,000 public safety and communications professionals, NENA remains committed to its singular mission of fostering the availability, implementation and technological advancement of a universal emergency telephone number system through education, training, planning and research. Again, we applaud your concern for "keeping 911 lines clear for true emergencies," and look forward to working with the Justice Department and others to consider alternative means of handling police non-emergency calls.

Sincerely,



John Ellison
President, NENA
and Executive Director, Shelby County, Alabama 9-1-1

cc: Janet Reno, Attorney General of the United States
Reed Hundt, Chairman, Federal Communications Commission

STATE/PROV	N11 Number(s)	Comments
British Columbia	411-DA; 611-repair; *311-cellular	
Ontario	411-DA; 611-repair	
Quebec	411-DA; 611-repair; 711-TTY	
Alabama		
Alaska		
Arizona		
Arkansas	None	
California	411-DA; 611-Repair;	LA, with 5 area codes; is working toward the same 7-digit non-emergency number
Colorado		
Connecticut	411-DA; 611-Repair; 811-Customer Service	Legislation has established only 9-1-1 may be used for emergency purposes
Delaware		
District of Columbia		
Florida		
Georgia	311-Non-emergency ambulance transport; 411-DA; 511-Yellow pages info; 611-repair; 711-advertising; 811-Entertainment info	
Hawaii		
Idaho		
Illinois		

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STATE/PROV	N11 Number	Comments
Indiana		
Iowa	411 - DA	
Kansas		
Kentucky	None	
Louisiana	211- Newspaper info; 311-private ambulance service; *577 Highway Patrol	311- in most parishes responds to subscriber residences (included some nursing homes) for emergency and non-emergency purposes (available in 23 of 64 parishes)
Maine	411-DA	*22 - Sheriff; *77 - State Police
Maryland	411-DA; 611-repair	311 will be used in 2 year pilot program for non-emergency calls
Massachusetts		
Michigan	None	
Minnesota	411-DA; 811-repair	
Mississippi	None	
Missouri		
Montana		
Nevada	311-Telco use; 411-DA; 611-repair; 711-test; 811-Customer Service	
New Hampshire		
New Jersey	411-DA; 611-repair; 711-test	Designated cellular prefix of 250
New Mexico		

STATE/PROV	N11 Number	Comments
New York		
North Carolina	411-DA; 611-repair; 811-test;	*HP - Highway Patrol
North Dakota	411-DA	1-800-472-2121 - established prior to 9-1-1; still available; printed on driver's license
Ohio	411-DA	*990 - Ohio Turnpike - direct to Highway Patrol; request pending for 811 from Rural/Metro as private Fire/EMS company
Oklahoma		
Oregon	None	
Pennsylvania		
Rhode Island	411-DA	Legislation prohibits any other 3-digit non-emergency numbers
South Carolina		
South Dakota		
Tennessee		
Texas		
Utah		
Vermont	411-DA; 811-test	
Virginia		
Washington	Cellular - 411/611 support info 211 - 811 for testing purposes	Utility/Transportation Commission made a statement against the use of any 3-digit number for emergency or non-emergency except 9-1-1
West Virginia		
Wisconsin	411-DA	
STATE/PROV	N11 Number	Comments

Wyoming		
	Note: International calling access code is 011	

TOTAL P.05

Revised October 8, 1996

Attachment C

INDICIA CURRENTLY IN USE

State Agency	Indicia currently used for cellular calls
Arkansas State Police	*55
California Highway Patrol	9-1-1 cellular
Delaware State Police	9-1-1
Florida Highway Patrol	*FHP is used for impaired and reckless drivers, stranded motorists, and/or suspicious incidents encountered on roadways.
Georgia State Patrol	*OSP; 9-1-1 for some local posts.
Illinois State Police	*77; *SP for non-emergency contact with the Illinois State Police.
Indiana State Police	9-1-1
Kansas Highway Patrol	*47; *KTA (for turnpikes)
Louisiana State Police	*9-1-1 is currently answered by local sheriffs' and police departments. *LSP (being developed)
Maine State Police	#77 - State Police #22 - Sheriff's Department 9-1-1 - Some municipalities
Maryland State Police	#77 (on interstate highways) for disabled vehicles; 9-1-1 for emergencies.
Michigan Department of State Police	9-1-1
Minnesota State Patrol	9-1-1 cellular
Missouri State Highway Patrol	*55 - Missouri State Highway Patrol 9-1-1 - Greater Kansas City 311 - St. Louis Area
Montana Highway Patrol	9-1-1 calls are routed to local law enforcement agencies. Statewide emergency "800" number is answered by Montana Highway Patrol.
Nevada Highway Patrol	*NHP
New Hampshire State Police	*77 and *NH
North Carolina State Highway Patrol	*HP for motorists needing contact with the North Carolina State Highway Patrol
Ohio State Highway Patrol	1-800-GRAB DUI; 1-800-525-5555; #DUI
South Carolina Highway Patrol	*HP; *DUI
Tennessee Department of Safety	*THP
Vermont State Police	9-1-1
Virginia State Police	#77 or *77
Washington State Patrol	Cellular companies transfer the 9-1-1 calls on the regular phone line to the 9-1-1 system that routes them to the State Patrol.
West Virginia State Police	*SP
Wisconsin State Patrol	*9-1-1 for calls to sheriff's office.

Table 3

Attachment D

TOWN
 ALBANY
 DENHAM SPRINGS
 FRENCH SETTLEMENT
 FROST
 HEAD OF ISLAND
 HOLDEN
 KELLIAN
 LIVINGSTON
 MAUREPAS
 FORT VINCENT
 SATSUMA
 SPRINGFIELD
 WALKER
 WATSON

POLICE**FIRE****AMBULANCE**

911 311

LIVINGSTON PARISH SHERIFF'S OFFICE**911****(504) 686-2241****1 800 443-7681****LOUISIANA STATE POLICE**

TROOP A (BATON ROUGE)	(504) 295-8500
TROOP B (NEW ORLEANS)	(504) 483-4830
TROOP C (GRAY)	(504) 857-3680
TROOP I (LAFAYETTE)	(318) 262-5880
TROOP L (MANDEVILLE)	(504) 893-6250

OTHER EMERGENCY NUMBERS

AMERICAN RED CROSS
(504) 924-4533
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
(504) 389-0489
CHILD FINDER
1 800 I AM LOST
1 800 426-5678
CHILD PROTECTION HOTLINE
(504) 925-4571
CRISIS INTERVENTION CENTER
(504) 924-3900
CIVIL DEFENSE
(504) 342-5470
DEPARTMENT OF ENVIRONMENTAL QUALITY
(504) 342-1234
1 800 424-8802

FEDERAL BUREAU OF INVESTIGATION
(504) 766-8342 (BR)
(504) 522-4471 (M.O.)
POISON INFORMATION CENTER
1 800 256-9822
RAPE CRISIS HOTLINE
(504) 383-7273
1 800 656-4673
US CUSTOMS SERVICE
1 800 535-9077
US DRUG ENFORCEMENT ADMINISTRATION
(504) 389-0254 (BR)
US IMMIGRATION BORDER PATROL
(504) 389-0231 (BR)
US SECRET SERVICE
(504) 389-0763 (BR)

MON AT WORK: _____

 (Name Of Company)
DIAL: _____
DAD AT WORK: _____

 (Name Of Company)
DIAL: _____

NEIGHBOR: _____
DIAL: _____
FRIEND: _____
DIAL: _____
MY NAME: _____
MY PHONE NUMBER: _____
MY ADDRESS: _____

Public Service Commission
N-1-1 Service Codes Public Hearing, December 6, 1995
Meeting Summary

Mr. Walnwright and I attended the Public Hearing on the N-1-1 Service Codes, PSC Docket U-20222. Other 9-1-1 districts represented included: Bozeler, Orleans, Baker Police Department, East Jefferson General Hospital, and Jefferson Parish 9-1-1. Letters of opposition were placed into the record from Caldwell 9-1-1, Ouachita, and the Jeff Davis Sheriff's Office.

Commissioner Irma Muse-Dixon presided over the meeting with Ted Lococco representing Commissioner Schweigman. Attorney, Brian Boddington and Gayle Kallner, represented the PSC.

Also present were representatives from: The Times Picayune, Capital City Express, McCormick Communications, BelSouth, Acadian and Priority Ambulance Companies.

The purpose of the Public Hearing was to receive information on any problems that had occurred during the one-year trial period related to the issuance of N-1-1 service codes.

Based upon the reports given by Mr. Richard Zuehlrog (Acadian Ambulance Company) and Mr. Michael Bostwright (Priority Ambulance Company), there have been approximately 6 (six) calls a month received by Acadian (3-1-1) that should have been received by 9-1-1, and 47 calls misrouted or received by Priority Ambulance (3-1-1) that should have gone to 9-1-1.

Based upon this information, over 119 calls were emergency calls that were received by 3-1-1 service codes that should have been received directly by a 9-1-1 system. The end result was delay to the responsible jurisdiction and service provision.

Mr. Robert Chadborne of E. Jefferson General Hospital and Jefferson Parish Communications District reported on misdials and hang-ups averaging 1-2% of total call volume and 5-10 calls per month that are misrouted. He reported of documentation and taped voice recordings of delays in responses from transferred calls from Priority Ambulance Company. Mr. Chadborne also provided copies of telephone stickers and the front inside cover of a telephone directory publicizing the use of 3-1-1 for ambulance service and the problem of confusion to the public.

Some technical (system operation) problems were reported by N-1-1 subscribers such as phantom calls. Phantom calls are generated by random outpulses caused by water in cables, for example, that generated a false call to a N-1-1 system and resulted in incorrect billing to a citizen. Also, Priority Ambulance expressed problems with all phones being able to access 3-1-1 within the Orleans call area. Testimony given by some N-1-1 subscribers disclosed that the tariff minimum call volume requirements had been altered from the original tariff by BelSouth and lowered from 10,000 calls per month to 6,000. Only Acadian Ambulance is meeting the call volume minimum.

At the closing of all testimony, Commissioner Dixon instructed all parties to continue to monitor problems over the next two (2) months. She stated that only with good documented problems, would the PSC consider reaching the issuance of N-1-1 Service Codes.

In a public safety environment, one misrouted or delayed call is enough to justify changing a policy or reaching a decision. They know about over 100.

Money and convenience seem to be driving the decision - not the potential for loss of life caused by confusion or delay because a call was placed to 3-1-1 instead of 9-1-1.



Caddo Parish Communications

District Number One

1144 Texas Avenue
Shreveport, Louisiana 71101

(318) 673-6400 voice
(318) 673-6406 fax

Martha Carter
9-1-1 Administrator
318-673-6406

Michael H. Wainwright
General Counsel
318-424-8060

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Shreveport, LA 71103

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5805 Fairfield
Shreveport, LA 71108

Ramona Emanuel
5464 Financial Plaza, #128
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Van Anderson
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Shreveport, LA 71118

December 20, 1995

Commissioner Irma Muse Dixon
Louisiana Public Service Commission
Vice-Chairman
District III
4100 Touro Street, #210
New Orleans, LA 70122

Dear Commissioner Dixon:

On behalf of the Board of Commissioners to the Caddo Parish 9-1-1 District, I want to thank you for allowing the communications districts to have another opportunity to express our concerns over the continuation of N-1-1 Service Codes, Order number U-20222.

I also wanted to clarify for the public hearing record that during the presentations, our legal counsel, Mr. Michael Wainwright, inadvertently stated that he was representing East Baton Rouge Parish, however, he was there acting as spokesman for the Caddo, Bossier, Orleans 9-1-1 Districts and the Baker Police Department, which is located within East Baton Rouge Parish.

Additionally, the Caddo Parish 9-1-1 District feels that the testimony presented during the December 6, 1995, public hearing supports our position that there is a problem with the continuation of N-1-1 service codes.

In a public safety environment, if one (1) 9-1-1 call is misrouted or a delay occurs in the transferring of a call to an emergency response agency, it mandates that we review our policies, procedures and employee performance.

Mr. Boatwright, representing Priority Ambulance stated that his company had documented 47 calls that were misrouted to their N-1-1 number that should have gone directly to a 9-1-1 center. The end result was a delay in the dispatching of emergency personnel. The total time of the delays could not be accurately documented. Mr. Zuchlag of Acadian Ambulance stated that his company was averaging six (6) calls per month that were misrouted during the one-year trial period.

Those totals added to Priority Ambulance equates to over 100 calls that were received by an N-1-1 number (3-1-1) that should have been directed to a 9-1-1

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center. In a public safety operation, this is unacceptable. This creates the potential for life-threatening situations which ultimately make national headlines and television stories such as the Philadelphia 9-1-1 incident, whereby a young boy was assaulted and died as the result of a delayed dispatch or as in Chicago, where 9-1-1 calls went unanswered because the 9-1-1 employees were asleep.

Our 9-1-1 center is constantly evaluating our operational procedures and policies to insure that we provide the highest possible level of public safety communications to the citizens of our parish. That is accomplished through employee training, good supervision, and proactive development of standard operating procedures. In public safety environments, we cannot wait until the totals or statistics are high enough to warrant a review or change in policies.

In summation, although the Caddo Parish 9-1-1 District is not currently affected by the issuance of N-1-1 numbers, the Public Service Commission's decision to allow the continuation of the service could impact our operation. Our concern comes from the potential of confusion that will be created should the two private ambulance companies in our parish be allowed to apply for and receive N-1-1 service numbers. That scenario will then create confusion of which three-digit number to call for emergency assistance.

I respectfully request that the Public Service Commission rescind its decision to issue N-1-1 service codes in our State. I know that there are financial considerations and the convenience issues that make the existing N-1-1 subscribers want to continue the service. We feel there is a public safety issue that was created when the first misrouted call occurred that cannot be ignored and cannot be fixed with technology. As long as multiple three-digit numbers exist for the citizens of our State to call to receive emergency assistance, there will be confusion, and ultimately, there will be the loss of life.

Sincerely yours,

Martha Carter

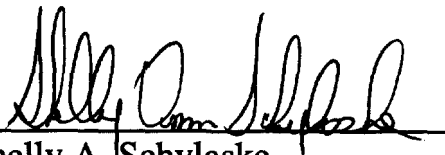
Martha Carter
9-1-1 Administrator

MC/rf

cc: Board of Commissioners, Caddo Parish Communications District Number One
Commissioner Don Owen, District V, Louisiana Public Service Commission
Mr. Ralph Ladnier, East Baton Rouge Parish Communications District

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 1996 a copy of the foregoing COMMENTS OF NENA AND NASNA was served upon the following recipients:



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